

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

MAJESTIC HILLS, LLC,  
Debtor.

Case No. 20-21595-GLT

Chapter 11

MAJESTIC HILLS, LLC,  
Movant,

Related to Doc. Nos. 10 and 12

v.

Hearing Date and Time:  
June 18, 2020 at 10:00 a.m.

MUTUAL BENEFIT INSURANCE  
COMPANY and WESTFIELD  
INSURANCE COMPANY,  
Respondents.

**JOINDER OF THE GATEWAY ENGINEERS, INC. TO THE OBJECTIONS OF NVR, INC., NORTH STRABANE TOWNSHIP, AND MORRIS KNOWLES & ASSOCIATES, INC.'S TO DEBTOR'S MOTIONS FOR ORDERS (I) APPROVING THE ASSUMPTION OF THE SETTLEMENT AGREEMENTS AND RELEASES BETWEEN THE DEBTOR AND MUTUAL BENEFIT INSURANCE COMPANY AND WESTFIELD INSURANCE COMPANY, (II) APPROVING THE SALE OF CERTAIN INSURANCE POLICIES, AND (III) ISSUING AN INJUNCTION PURSUANT TO THE SALE OF CERTAIN INSURANCE POLICIES**

AND NOW comes The Gateway Engineers, Inc. ("Gateway"), by and through its counsel, Thomas H. Ayoob, III, Esquire, Matthew Junker, Esquire, and Thomas H. Ayoob III & Associates, LLC and files the following Joinder to the Objections of NVR, Inc., North Strabane Township, and Morris Knowles & Associates, Inc. to Debtor's Motions For Orders (I) Approving The Assumption Of The Settlement Agreements And Releases Between The Debtor And Mutual Benefit Insurance Company And Westfield Insurance Company, (II) Approving The Sale Of Certain Insurance Policies, And (III) Issuing An Injunction Pursuant To The Sale Of Certain Insurance Policies (the "Motion") as follows:

1. On May 21, the Debtor initiated this case by filing a Voluntary Petition for Relief under Chapter 11 of the Bankruptcy Code.

2. On the same day this case was filed, Debtor filed the following two motions: (1)  
{00209750 / 1}

EXHIBIT

"A"

Motion for an Order (I) Approving the Assumption of the Settlement Agreement and Release Between the Debtor and Mutual Benefit Insurance Company, (II) Approving the Sale of Certain Insurance Policies, and (III) Issuing an Injunction Pursuant to the Sale of Certain Insurance Policies; and (2) Motion for an Order (I) Approving the Assumption of the Settlement Agreement and Release Between the Debtor and Westfield Insurance Company, (II) Approving the Sale of Certain Insurance Policies, and (III) Issuing an Injunction Pursuant to the Sale of Certain Insurance Policies (collectively the “Motions”).

3. NVR, Inc. and North Strabane Township filed Objections to the Motions at ECF Docs. 62 and 68 on June 8, 2020 (the “NVR and North Strabane Objections”).

4. Morris Knowles & Associates, Inc. filed a combined Objection to the Motions at ECF Doc. 72 on June 8, 2020 (the “Morris Knowles Objection”).

5. The arguments raised in the NVR and North Strabane Objections and the Morris Knowles Objection are equally applicable to Gateway.

6. For the reasons set forth in the NVR and North Strabane Objections and the Morris Knowles Objection, Gateway objects to the Motions.

WHEREFORE, in consideration of this Joinder and the NVR and North Strabane Objections and the Morris Knowles Objection, Gateway respectfully requests that this Honorable Court enter an order denying the Motions.

THOMAS H. AYOOB III & ASSOCIATES, LLC

By: /s/ Matthew Junker, Esquire  
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